

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

JOHN BARNHARDT, ET AL.

PLAINTIFFS

AND

UNITED STATES OF AMERICA

PLAINTIFF-INTERVENOR

VS.

CIVIL ACTION NO. 4:65CV01300-HTW-LGI

**MERIDIAN MUNICIPAL SEPARATE
SCHOOL DISTRICT, ET AL.**

DEFENDANTS

AFFIDAVIT OF DR. AMY CARTER

Before me the undersigned Notary Public personally appeared Dr. Amy Carter, who,
upon being duly sworn, deposes and says the following:

1. My name is Dr. Amy Carter. I am an adult resident citizen of the state of Mississippi. I am competent to execute this affidavit.
2. I am the Superintendent of the Meridian Public School District ("the District"). I have direct knowledge of the facts set out in this affidavit.
3. On May 18, 2023, the Meridian Public School District (the "District") submitted its Second Motion to Modify Desegregation Plan and for Expedited Consideration to the Court seeking approval to reconfigure attendance zones for its elementary schools. [180].
4. On August 11, 2022, during an evidentiary hearing on the District's first Motion to Modify Desegregation Plan and for Expedited Consideration, I shared with the Court and the

Parties that there would be a need to discuss a plan for reconfiguration of the elementary schools in the District in the very near future.

5. In March 2023, the District hosted a series of internal and external meetings with staff members and community stakeholders, including the following:

- March 6, 2023, 5:00 p.m.: Oakland Heights community and staff
- March 6, 2023, 6:00 p.m.: TJ Harris community and staff
- March 7, 2023: Superintendent met with members of the Carver Coalition
- March 7, 2023: Zoom meeting for parents who were unable to attend the in person meetings
- March 9, 2023: In-person meeting open to the public and anyone who could not attend the earlier meetings

6. During these sessions, I explained the rationale for reconfiguring the elementary schools and provided an update to the staff, parents and community stakeholders about the two existing middle schools. The proposed plan was shared:

- Move Oakland Heights students to a better facility (Carver);
- TJ Harris students will be divided between Carver and Crestwood;
- TJ Harris Upper would become New Administrative Complex; and,
- TJ Harris Lower would become our Little Wildcat Academy for all Pre-K Students.

7. District personnel specifically scheduled a meeting with representatives of the Carver Coalition, Mrs. Tracy Clark Washington and Mr. Robert Markham. Mrs. Washington and Mr. Markham were in attendance at the evidentiary hearing on August 11, 2022. They, along with other members of the Carver Coalition, expressed support for the proposed plan to reconfigure the elementary schools, because students would be returning to the Carver campus. Mrs. Washington and Mr. Markham shared that their previous opposition to the closure of Carver Middle in the 2022-2023 school year was disappointment with District personnel for not seeking their input on closure of the Carver Middle School campus. Mrs.

Washington and Mr. Markham concluded the meeting with appreciation that the District had listened to Coalition's concerns and proposed action to address those concerns. On March 21, 2023, the School Board voted unanimously to support the recommendation of the superintendent regarding reconfiguring the elementary schools. On March 22, 2023, I submitted a letter to Judge Wingate informing the Court of the Board's vote, the proposed reconfiguration, and advising that the District would be seeking formal approval to redraw the elementary attendance zone lines.

8. The rationale for the elementary school reconfiguration is based on the following: age of the facilities (average age of buildings is 60 years old); declining student enrollment at many of our elementary schools (TJ Harris and Oakland Heights have some larger declines); operating too many buildings for the number of students the District serves; families moving out of the area; difficulties with staffing schools; and the need to be better stewards of taxpayers' funds.

9. Based on the last facilities study and estimates, the District would need approximately \$96,000,000.00 for campus improvements (including but not limited to proper lighting, safety, security, classroom upgrades, roofs, etc.). Closing one middle school campus alone saves the District over \$500,000.00 per year. Both Magnolia and Northwest Middle Schools opened fully staffed for the 2022-2023 school year, and the District is no longer educating less than a 1,000 students across three campuses.

10. The District's desegregation orders were entered to ensure children of color received equitable and quality educational experiences, resources, and facilities. The LDF's opposition to the District moving forward with the proposed plan to reconfigure elementary

schools is creating a new set of issues for the children of our Meridian. If students are required to return to the campuses as they are currently configured (six elementary school across seven campuses) for the 2023-2024 school year or if the Court continues to delay a decision regarding the closure of Carver Middle and the approval of the elementary reconfiguration, the following vacancies of teachers and/or administrators would be detrimental to the children of Meridian

Public School District:

- Oakland Heights: 7 of 31 vacancies including the principal and assistant principal
- TJ Harris Upper: 9 of 25 vacancies including the principal
- TJ Harris Lower: 2 of 24 vacancies
- Crestwood: 5 of 23 vacancies including the assistant principal.

11. Despite the District's efforts to continue to be on the cutting edge with recruitment and retention, and with peak recruitment and hiring season behind us, the District would be forced to hire an excessive amount of non-licensed substitutes to educate our students. Most of these vacancies will be filled with the plan to reconfigure the elementary schools.¹

12. Another area of concern is the negative impact the delay will have on educators who are looking forward to moving into a better facility. As I mentioned on the May 17, 2023, and May 18, 2023, status conferences with the Court, the excessive water at Oakland Heights puts students and staff in a situation where they are spending excessive amounts of time mopping up water or walking through water inside the school building. Also there is water pouring down the walls of some classrooms when there is heavy rain. Once again a delayed

¹ See, Meridian Public School District Human Capital Plan approved by the MS Department of Education and Meridian Public School District Board of Trustees: [2023-2024 Human Capital Strategic Plan](#).

ruling, will have negative effects on the education and safety of the children of Meridian Public School District.

13. As it relates to the Carver Middle School motion, [167], re-opening the school a year after the motion was filed would also cause a hardship to educating of the children of Meridian. At the time of the District's request to reconfigure its middle schools for the 2022-2023 school year, the middle schools had the following number of vacancies:

- Carver: 14 of 31
- Magnolia: 9 of 38
- Northwest: 13 of 45

Placing middle school students back in the Carver building would require the District to replace thirty-seven teachers at the middle school level over the summer after peak hiring season. A continuing delay in ruling on the Carver Middle School motion will further delay the elementary school reconfiguration. Again, this is not in the best interest of students and places our students at an educational disadvantage.

Further affiant sayeth not.

Dated: May 25 2023.



Dr. Amy Carter

STATE OF MISSISSIPPI
COUNTY OF LAUDERDALE

On this 25th day of May, 2023, personally appeared before me, a notary public for the State of Mississippi, Dr. Amy Carter, whose name is subscribed to this affidavit, and acknowledged under oath its contents and that she personally executed same.


NOTARY PUBLIC

My commission expires



Seal: